

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JEREMY P. WAGNER and : CHAPTER 13
WHITNEY L. WAGNER :
Debtor(s) :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
JEREMY P. WAGNER and :
WHITNEY L. WAGNER :
Respondent(s) : CASE NO. 1-20-bk-03573

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 25th day of October, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. § 1325(a)(3) in that it has not been proposed in good faith. Base plan should be no less than \$12,877.80.
2. Trustee avers that debtor(s)' plan cannot be administered due to the lack of the following:
 - a. Last paystub dated October, 2021 (for both debtors).

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/James J. Jones
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 25th day of October, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Sara Austin, Esquire
226 E. Market Street, Suite 2
York, PA 17403

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee